

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

ALI ABDALLA HAMZA, *et al.*,  
 Plaintiffs,  
 v.  
 KHALIFA HIFTER,  
 Defendant.

1:20-cv-01038 (LMB/MSN)

## DEFENDANT'S MOTION TO COMPEL AND FOR SANCTIONS

Defendant Khalifa Hifter respectfully moves this Court to compel Plaintiff Ali Abdalla Hamza to: (1) complete his deposition; (2) answer questions relating to eyewitnesses to the alleged conduct in Plaintiffs' Complaint; and (3) provide a list of eyewitnesses to Mr. Hifter's counsel. Defense counsel and Plaintiffs' counsel have met and conferred regarding these issues. For the reasons set forth in the supporting memorandum, Mr. Hifter respectfully requests this Court to compel Plaintiff to fully complete his deposition and to sanction Plaintiffs' counsel for their obstruction.

Dated: October 29, 2021

Respectfully submitted,

/s/ Lindsay R. McKasson  
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**CERTIFICATE OF SERVICE**

I certify that on October 29, 2021, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

Dated: October 29, 2021

/s/ Lindsay R. McKasson

Lindsay R. McKasson

*Attorney for Defendant Khalifa Hifter*